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Attorney for Defendant Canovas

IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM

COMES NOW the Defendant, JONATHAN E. CANOVAS, by and through his counsel, Phillip J. Tydingco of the Alternate Public Defender Office, and hereby respectfully moves this Honorable Court to permit a short continuance of the sentencing hearing scheduled for 10:00 a.m. on October 10, 2006 to the next day on October 11, 2006 or the next couple days thereafter subject to the Court's docket schedule, based on the following reasons:

2. The undersigned counsel was just informed this afternoon on October 6, 2006 that

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1 this Honorable Court will not grant its motion requesting permission to have the telephonic
2 testimony of Postal Inspector Craig M. Hales of the U.S. Postal Service, who is presently re-assigned
3 or relocated to the State of Utah; however, counsel is also informed that this Honorable Court may
4 permit written testimony.

5 3. The undersigned counsel is also preparing for a sentencing hearing for another client
6 (John Junior Cruz) on the same day with this Court, but requires additional time or at least twenty-
7 four hours to try and obtain Inspector Hales written testimony for Defendant Canovas.

8 Therefore, based on the forgoing, Defendant Canovas respectfully request that this Court
9 grant a short extension or continuance of his sentencing hearing.

10 Respectfully submitted this 6th day of October, 2006.

11 ALTERNATE PUBLIC DEFENDER:

12 Attorneys for Defendant Jonathan E. Canovas

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